SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP ONE MANHATTAN WEST

NEW YORK IOOOI

TEL: (212) 735-3000 FAX: (212) 735-2000

DIRECT DIAL (212) 735-3067 DIRECT FAX (9 | 7) 777-3067 EMAIL ADDRESS JORDAN.FEIRMAN@SKADDEN.COM www.skadden.com

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES PALO ALTO WASHINGTON, D.C. WILMINGTON BRUSSELS FRANKFURT LONDON MOSCOW MUNICH PARIS SÃO PAULO SEOUL SHANGHAI SINGAPORE TOKYO

TORONTO

February 9, 2024

VIA ECF AND EMAIL

Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 40 Foley Square, Room 435 New York, New York 10007 ALCarterNYSDChambers@nysd.uscourts.gov

Kee v. The Detroit Lions, Inc. et al., No. 1:24-cv-00223-ALC (S.D.N.Y.) RE: **Consented Motion for Extension of Time to Respond to Complaint**

Dear Judge Carter:

We represent Defendants NFL Properties LLC and NFL Enterprises LLC (the "NFL Parties"), and write jointly on behalf of (1) the NFL Parties and co-Defendants (2) The Detroit Lions, Inc., (3) Getty Images (US) Inc., (4) Fanatics Retail Group North, LLC, (5) Bullion International, Inc. d/b/a The Highland Mint, and (6) McFarlane Toys, Inc. (collectively, "Defendants") in connection with the above-referenced matter.

As reflected by the Affidavits of Service filed by Plaintiff (ECF 29-35), the Complaint has been served on the Defendants on dates between January 23 and February 2. Accordingly, the first responses to the Complaint (by the NFL Parties and Fanatics Retail Group North, LLC) are due on February 13.

The above-listed Defendants have coordinated with Plaintiff, and all parties have consented to an extension of Defendants' time to respond to the Complaint to Friday, March 22, 2024. The parties respectfully request that the Court enter an order permitting the Defendants to answer or otherwise respond to the Complaint by that date. No prior requests for an extension have been made by any party.

The Parties thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Jordan A. Feirman
Jordan A. Feirman

cc (by ECF and/or email):

Counsel for Plaintiff:

Kevin Patrick McCulloch & Nathaniel Kleinman, McCulloch Kleinman Law

Counsel for The Detroit Lions, Inc.:

Susan Kornfield & Justin Bagdady, Bodman PLC

Counsel for Getty Images (US) Inc.:

James Rosenfeld and Nimra Azmi, Davis Wright Tremaine LLP

Counsel for Fanatics Retail Group North, LLC:

Rob Potter, Kilpatrick Townsend & Stockton LLP

Counsel for Bullion International, Inc. d/b/a The Highland Mint:

Craig Miller, Lathrop GPM

Counsel for McFarlane Toys, Inc.:

Jura Zibas & Stephen Barrett, Wilson Elser